

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON
WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**PLAINTIFF-INTERVENOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' JOINDER TO PLAINTIFFS' OMNIBUS
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS
PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM UG'S
MOTION TO DISMISS AND DEFENDANT BRANDON WILLIAMS'S
MOTION TO DISMISS OR FOR SUMMARY JUDGMENT**

The Official Committee of Unsecured Creditors (the "Committee") appointed in the chapter 11 cases of the above-captioned debtors and debtors-in-possession, as Plaintiff-Intervenor in the above-captioned adversary proceeding, by and through its undersigned counsel, hereby

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

submits this joinder (this “Joinder”) to the *Plaintiffs’ Omnibus Memorandum of Law in Opposition to Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG’s Motion to Dismiss and Defendant Brandon Williams’s Motion to Dismiss or for Summary Judgment* [Docket No. 58] (the “Opposition”), in opposition to the *Motion to Dismiss Complaint by Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG* [Docket No. 31] and *Defendant Brandon Williams’s Motion to Dismiss or for Summary Judgment* [Docket No. 34] (collectively, the “Motions”), and in support hereof, respectfully states as follows:

JOINDER

1. The Committee respectfully supports and joins in the Opposition to the Motions and incorporates the Opposition as if fully set forth herein.
2. Nothing contained herein shall constitute a waiver of any rights or remedies of the Committee, including, without limitation, the right to: (i) amend, modify, or supplement this Joinder; or (ii) raise any other additional arguments at a later date.

WHEREFORE the Committee, as Plaintiff-Intervenor, respectfully requests that the Court deny the Motions and grant such other and further relief as the Court finds just and appropriate.

Remainder of page intentionally left blank

Dated: December 15, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert F. Poppiti, Jr.

Matthew B. Lunn (No. 4119)
Robert F. Poppiti, Jr. (No. 5052)
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mlunn@ycst.com
rpoppetti@ycst.com

-and-

PAUL HASTINGS LLP
Kristopher M. Hansen*
Kenneth Pasquale*
Isaac S. Sasson*
John F. Iaffaldano*
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090
Email: krishansen@paulhastings.com
kenpasquale@paulhastings.com
isaacsasson@paulhastings.com
jackiaffaldano@paulhastings.com

**Admitted pro hac vice*

*Counsel to Plaintiff-Intervenor The Official Committee
of Unsecured Creditors*